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24 Class

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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30 *IN RE: ZOOM VIDEO COMMUNICATIONS,*
31 *INC. PRIVACY LITIGATION*

32 This Document Relates To:
33 All Actions

34 Master Case No: 3:20-cv-02155-LB

35 **JOINT DECLARATION OF TINA
36 WOLFSON AND MARK C.
37 MOLUMPHY IN SUPPORT OF
38 MOTION FOR INDICATIVE RULING
39 RE APPROVAL OF SETTLEMENTS
40 WITH OBJECTOR-APPELLANTS**

41 Hon. Laurel Beeler
42 Courtroom: B
43 Date: December 1, 2022
44 Time: 9:30 AM

We, Tina Wolfson and Mark Molumphy, declare and state as follows:

1. I, Tina Wolfson, am a member of the bar of the State of California, New York, and District of Columbia and duly licensed to practice before all courts of the State of California as well as other state and federal courts. I am a partner and founding member of the law firm Ahdoot & Wolfson, PC (“AW”), established in 1998, and have litigated complex consumer and privacy class actions for over two decades.

2. I, Mark Molumphy, am a member of the bar of the State of California and duly licensed to practice before all courts of the State of California as well as other federal courts. I am a partner at the law firm of Cotchett, Pitre & McCarthy LLP (“CPM”), and have litigated complex consumer and privacy class actions for over two decades.

3. We are interim co-lead counsel for the Class Representatives and the putative class. We have personal knowledge of the facts stated below and the proceedings in this case. If called as witnesses, we would and could competently testify thereto to all facts within our personal knowledge.

4. We respectfully submit this joint declaration in support of Plaintiffs' Motion for an Indicative Ruling re Approval of Settlements with Objector-Appellants (the "Motion").

5. The settlements, if approved, will facilitate the claims and distribution process (Rodgers/Neace settlement) and provide an additional limitation to the scope of the release (Cohen settlement). Further, to the extent service payments to the objectors or fee and expense awards to objectors' counsel are approved, they would be paid from the prior award to Class Counsel, and not reduce in any way the funds available for distribution to Class Members. Finally, the settlements require dismissal of the objectors' appeals and permit immediate distribution of the Settlement Fund to eligible Class Members. For these reasons, and the reasons set forth in the Motion, we believe the settlements with the objectors are in the best interests of the Settlement Class.

6. Attached hereto as Exhibit A is a true and correct copy of the settlement agreement with Objectors Rodgers and Neace.

1 7. Attached hereto as Exhibit B is a true and correct copy of the settlement agreement
2 with Objector Cohen.

3 We declare under penalty of perjury that the foregoing is true and correct.
4

5 Executed on this 27th day of October, 2022, by Mark C. Molumphy in Burlingame,
6 California Tina Wolfson in Los Angeles, California.
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8 _____
9 /s/ *Mark C. Molumphy*
Mark C. Molumphy

8 _____
9 /s/ *Tina Wolfson*
Tina Wolfson

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17 **SIGNATURE ATTESTATION**

18 I am the ECF User whose identification and password are being used to file the foregoing
19 Joint Declaration of Wolfson and Molumphy in support of Joint Unopposed Motion for Indicative
20 Ruling re Approval of Settlements with Objector-Appellants. Pursuant to L.R 5-1(i)(3) regarding
21 signatures, I, Mark C. Molumphy attest that concurrence in the filing of this document has been
22 obtained.

23 DATED: October 27, 2022

24 _____
/s/ *Mark C. Molumphy*
Mark C. Molumphy